

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF THE SEARCHES OF:

529 THOMAS STREET  
PITTSBURGH, PA 15239

Magistrate No. 24-1546

2018 BLACK JEEP CHEROKEE

Magistrate No. 24-1547

**AFFIDAVIT IN SUPPORT OF AN APPLICATION  
UNDER RULE 41 FOR WARRANTS TO SEARCH AND SEIZE**

I, Matthew Doherty, being duly sworn, do hereby state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the United States Postal Service – Office of Inspector General (“USPS OIG”) and have been so employed since July 2022. As part of my duties, I am assigned to the Pittsburgh Resident Office, with an assigned territory of the Western Judicial District of Pennsylvania. My responsibilities include investigations of mail theft, specifically pertaining to violations committed by employees of the United States Postal Service (“USPS”). Prior to working as a Special Agent with the USPS OIG, I worked as a Special Agent with the Naval Criminal Investigative Service (NCIS), from August 2015 to July 2022. Before becoming a Special Agent, I received training at the Federal Law Enforcement Training Center (“FLETC”) where I was trained in narcotics trafficking, money laundering, undercover operations, confidential informants, and electronic and physical surveillance techniques. As a Special Agent with NCIS and USPS OIG, I was responsible for investigating the use, possession, and distribution of narcotics. I have conducted numerous complex drug investigations which

encompassed the use of undercover buy operations, surveillance operations, the use of informants, and search warrants.

2. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I am also an “investigative or law enforcement officer” of the United States, that is, an officer of the United States who is empowered by the law to conduct investigations of and to make arrests for the offenses enumerated in Title 18 and Title 21 United States Code.

3. This affidavit is made in support of an application to obtain a search warrant for the following property and persons, located within the Western District of Pennsylvania and described more fully in **Attachments A-1 and A-2** for the items described in **Attachment B**, all based on evidence set forth below indicating violations of 18 U.S.C. § 1344 (Bank Fraud) and 21 U.S.C. § 841.

- a. 529 Thomas St, Pittsburgh, PA 15239 (“**Target Residence**”).
- b. A black 2018 Jeep Cherokee vehicle bearing PA license plate MBT8405 (“**Subject Vehicle**”)

#### **SOURCES OF INFORMATION**

4. I make this affidavit based upon personal knowledge derived from my participation in this investigation and from information I have learned from discussions with other law enforcement officers; from interviews and discussions with victims and witnesses; from physical and electronic surveillance conducted by law enforcement officers; and my review of federal agency and private entity business records.

5. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence of the violations of law to be found within the property to be searched.

6. Based on my training and experience and facts set forth in this affidavit, I submit there is probable cause to believe that violations of Title 18, United States Code, 1344, and Title 21, United States Code, Section 841 have been committed by Jajuan Brown, and that evidence is located within/on the **Target Residence**. There is probable cause to search the premises described in **Attachments A-1 and A-2**, for evidence of those crimes, as described in **Attachment B**.

**SPECIFIED FEDERAL OFFENSES**

7. **21 U.S. Code § 841 (Prohibited acts A)**

a. Except as authorized by this subchapter, it shall be unlawful for any person knowingly or intentionally—

(1) to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance; or

(2) to create, distribute, or dispense, or possess with intent to distribute or dispense, a counterfeit substance.

8. **18 U.S.C. § 1344 (Bank Fraud)** generally prohibits a person from:

a. executing, or attempting to execute, a scheme or artifice to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises.

**STATEMENT OF PROBABLE CAUSE**

9. On September 10, 2024, The United States District Court, in the Western District of Pennsylvania issued a warrant for the arrest of **Jajuan BROWN (“BROWN”)** (2:24-CR-00196-CB) for violations of 18 U.S.C 1708, Mail Theft, and 18 U.S.C. 922(g)(1), Felon in Possession of a Firearm. Investigators from the United States Postal Service – Office of Inspector General (USPS-OIG), as well as the Bureau of Alcohol Tobacco, Firearms and Explosives (ATF), are aware that **BROWN** operates a 2018 Jeep Grand Cherokee bearing Pennsylvania License Plate MBT8405 (“**Subject Vehicle**”). Investigators are also aware that this vehicle is registered to Maria Green, the mother of Jajuan Brown. Furthermore, this vehicle is registered to 326 Grove Street in East McKeesport which is **BROWN**’s address of record on his Pennsylvania Driver’s License. Members of USPS-OIG and ATF attempted surveillance at this location and discovered it had been condemned due to damage. **BROWN** provided Allegheny County Probation with the address 534 Grandview Street in East Pittsburgh, PA. Your Affiant is aware that this is the address Maria Green provided when obtaining her Pennsylvania Driver’s License.

10. From September 10, 2024 through September 17, 2024 Your Affiant, along with other members of ATF and USPS-OIG surveilled 534 Grandview Avenue without successfully seeing **BROWN** or the black Jeep Grand Cherokee. Investigators utilized license plate readers (LPRs) throughout Allegheny County and the City of Pittsburgh to establish a pattern of **BROWN**’s movements and discovered **BROWN** would frequently drive through the LPR at Route 380 (Saltzburg Road) East towards Plum Borough in the evening hours, and Route 380 West towards Penn Hills the following day prior to being seen in additional LPRs. Your Affiant is aware that this pattern occurred on the nights of September 8, 9, 10, 16, and 17.

11. On September 17, 2024, the Plum Police Department (PPD) informed Your Affiant that the vehicle had been seen at 529 Thomas Street in Plum Borough. On this same evening members of ATF, USPS-OIG and PPD surveilled the Black Jeep Grand Cherokee drive past the location of the Route 380 East LPR at 9:08 pm, turn onto Thomas Street, and back the vehicle into the side driveway of the **Target Residence** at approximately 9:10 pm. According to Google Maps, the distance from this LPR to 529 Thomas Street is approximately 0.3 miles.

12. On September 18 and 19, 2024, additional surveillance of the **Target Residence** was conducted by ATF, USPS-OIG and PPD and the **Subject Vehicle** was observed at the **Target Residence**.

13. On September 19, 2024, The United States District Court, in the Western District of Pennsylvania issued a search warrant to search the **Target Residence** for **BROWN** (2:24-MJ-01538-KT [Sealed]).

14. On September 20, 2024, at 0611 hours the signed search warrant (2:24-MJ-01538-KT [Sealed]) was executed at the **Target Residence**. During the execution Investigators observed in plain view a Pennsylvania state identification (“ID”), non-driver for ID purposes only, in the name of **Montese WILSON**. The ID was located within the first-floor bedroom on a dresser.

15. Affiant notes prior investigative activity identified **BROWN** using a bank account associated with **WILSON** to commit check/bank fraud using a check suspected to have been stolen from the US Mail stream. **BROWN’s** cellular telephone, obtained pursuant to the search warrant issued at Mag. No. 2:23-mj-01805-MPK (Sealed), contained a message received from phone number 412-652-3956, a number that records queries associate with **WILSON**. The message was sent on July 26, 2023 at 3:17:22 PM.

16. On August 11, 2023, Ben Stahl (Stahl), Chief Executive Officer, Veterans Leadership Program, notified Affiant regarding a fraudulently deposited check which was related to stolen US mail found discarded in a dumpster. Stahl explained the check was in an envelope mailed on July 14, 2023, at the blue USPS collection box located outside of the Crafton PO. Stahl specified the payee's name was altered to Montese Wilson. A photograph of the altered check is below.

17. On July 17, 2023, a \$15,000 check was deposited at the ATM located at 146 Bridge St, Homestead, PA. A photograph of the deposited check is below:

WARNING: THIS DOCUMENT HAS SECURITY FEATURES IN THE PAPER

**VETERANS LEADERSHIP PROGRAM**  
OF WESTERN PENNSYLVANIA, INC.  
OPERATING ACCOUNT  
2934 SMALLMAN ST.  
PITTSBURGH, PA 15201  
(412)481-6200

8-9/430

**PNC BANK**  
PNC Bank, National Association  
Pittsburgh, PA

87962

DATE 7/14/2023

PAY TO THE  
ORDER OF Montese Wilson \$ \*\*15,000.00

Fifteen thousand and 00/100\*\*\*\*\* DOLLARS

Montese Wilson  
2407 Bedford Ave Apartment 401  
Pittsburgh, PA 15219-4021

Joshua Jarrett  
Ben Stahl

⑈087962⑈ ⑈043000096⑈ ⑈048083276⑈

18. On July 17, 2023, the above \$15,000 check was deposited at the ATM located at 146 Bridge St, Homestead, PA. A photograph of the depositor is below:

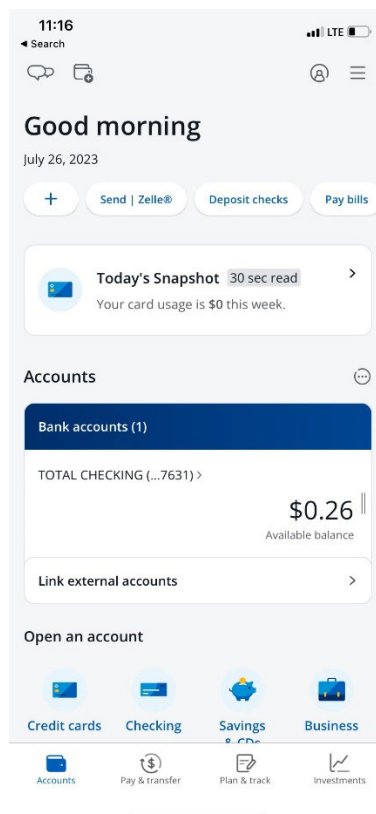


19. On November 6, 2023, at 0934 hours the signed search warrant at Mag. No. 2:23-mj-01693-MPK (Sealed) was executed at 340 Pointview Road, Brentwood, PA 15227, which is the former residence of **BROWN**. Investigators seized from the premises items of evidence to include, stated IDs, a passport, approximately 1,900 checks, US Mail, brake fluid, check stock printer paper, gift cards, credit cards, cell phones and computers. A red jacket matching the above ATM surveillance image was located and seized. A photograph of the seized jacket is below:





20. BROWN's phone, which was also seized on November 6, 2023 and searched thereafter, included a message from WILSON containing the image below, which appears to be a screen capture of a bank application.





21. The combination of WILSON's identification in plain view in the **Target Residence**, the messages between BROWN and WILSON, and the 1,900 checks found in BROWN's home in November provide probable cause to believe that the **Target Residence** contains evidence of bank fraud.

22. On September 20, 2024, while executing the search warrant at the **Target Residence**, investigators observed in plain view approximately twenty (20) designer marijuana bags inside the **Subject Vehicle** on the backseat floor. Based on training and experience the quantity appears to be more than personal use. The **Subject Vehicle** is parked in the driveway of the **Target Residence**. Designer marijuana refers to a class of lab-made substances that are chemically similar to chemicals found in the cannabis plant, though they often produce very different effects. Some designer marijuana have potential or current medical uses but many are illicitly manufactured and sold. Additionally, Investigators observed in plain view a small scale in a bedroom within the **Target Residence**. Your Affiant knows scales are commonly used to weigh drugs.

### **CONCLUSION**

23. Based on the facts set forth in this affidavit, I submit there is probable cause to believe that the specified federal offenses herein have been violated and that the items listed in **Attachment B** will likely be found at/on **Target Residence**. Accordingly, I respectfully request that this Court issue a search warrant for the **Target Residence**, more particularly described in **Attachments A-1 and A-2**, authorizing the seizure of the items described in **Attachment B**, which constitute evidence, contraband, fruits, and other items related to violations of the specified federal offenses.

24. The above information is true and correct to the best of my knowledge, information, and belief.

S/ Matthew Doherty  
MATTHEW DOHERTY  
Special Agent  
USPS OIG

Sworn and subscribed to me, by telephone  
pursuant to Fed. R. Crim. P. 4.1(b)(2)(A),  
this 20th day of September, 2024.

\_\_\_\_\_  
HONORABLE KEZIA O. L. TAYLOR  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A-1**

**Property to be Searched**

**529 Thomas St, Pittsburgh, PA 15239**

The entire property, including outhouses, located at **529 Thomas St, Pittsburgh, PA 15239**.

The residence is a one (1) story building located near the intersection of Thomas St and Pierson Run Road in Plum Borough. Records indicate the residence is 996 square feet and contains 3 bedrooms and 1.5 bathrooms. The exterior of the residence has tan siding with white trim. **529 Thomas St, Pittsburgh, PA 15239** is depicted in the photographs below.



**ATTACHMENT A-2**

**Property to be Searched**

**2018 Jeep Cherokee**

A black 2018 Jeep Cherokee bearing Pennsylvania license plate MBT8405, VIN 1C4RJFBG9JC388993, which is more accurately depicted in the photograph below:



**ATTACHMENT B**

**Items to be Seized**

This Warrant authorizes law enforcement officers to enter the search location specified in **Attachments A-1 and A-2**, including, where necessary, by means of trespass over private property, to search the premises and seize evidence, fruits, and instrumentalities of 21 U.S. Code § 841 (Prohibited acts A), and 18 U.S.C. 1344 (Bank Fraud), including the following:

1. Checks, credit cards or other monetary instruments of others.
2. Documents containing the personal identifying information of others.
3. Records evidencing the accumulation, retention, secretion, dissipation and/or transfer of funds and/or of assets, and/or the accumulation of debt, including bank account statements.
4. Indicia of occupancy, residency, rental and/or ownership of the target residence including but not limited to, utility bills and lease agreements.
5. Cash in excess of \$5,000.
6. Check making, or altering, equipment and materials including check stock and printers.
7. Cell phones which may include evidence of the violations or information described above.
8. Computers or storage media which may include evidence of the violations or information described above.
9. Narcotics or narcotics paraphernalia.
10. Other documents relating to narcotics trafficking activity, including written instructions, addresses, logs, ledgers, and other communications.
11. Concealment materials, packaging material, cutting agents, and other materials relating to narcotics trafficking.